

Exhibit 4

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January 31, 2020

VIA FEDEX

Re: Notice under the Class Action Fairness Act of 2005, 28 U.S.C. § 1711 et seq.
Robert Berry, individually and on behalf of all other similarly situated v. Wells Fargo & Company, et al., Case No. 3:17-cv-00304-JFA, U.S. District Court for the District of South Carolina

Dear Sir or Madam:

Pursuant to the Class Action Fairness Act, 28 U.S.C. § 1715 ("CAFA"), I am writing, on behalf of Defendants in the above-referenced matter, to provide your office with notice of the parties' proposed settlement. Please take notice of the following information.

With Defendants' consent, Plaintiff in the above-captioned matter filed a motion with the United States District Court for the District of South Carolina on January 31, 2020, requesting preliminary approval of the parties' proposed settlement. As part of this notice, please find copies of the following documents associated with this matter on the enclosed CD:

1. The original Complaint and the operative Amended Complaint, which constitute all complaints filed in the matter;
2. The motion for preliminary approval of the settlement and all of its supporting documents, which include the proposed notice to be distributed to class members and the proposed settlement agreement. Class members do not have rights to request exclusion from the class;
3. At this time, because the class consists of former employees whose state of residence may have changed, it is not feasible to provide a list of the class members who reside in each state and the estimated proportionate share of the claims of such members to the entire settlement. However, enclosed is a chart showing the approximate number of class members who reside in each state, based on the most-current address information on file with the Plan. Further, because of the calculations that must be performed to determine class members' allocations, it is not feasible at this time to provide further detail regarding the claims of class members in each state;
4. A copy of the Court's docket sheet; and
5. A copy of the Court's order granting preliminary approval.

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There are no contemporaneous agreements between class counsel and counsel for Defendants in conjunction with the proposed settlement, other than the enclosed settlement agreement. At this time, there has been no final judgment or notice of dismissal, and there are no written judicial opinions relating to the matters detailed in this notice, except for the preliminary approval order enclosed. The Court has scheduled the fairness hearing for [date, time, location].

If you have questions about this notice, the settlement, or the enclosed materials, or if you did not receive any of the above-listed materials, please contact this office.

Very truly yours,

SEYFARTH SHAW LLP

Amanda A. Sonneborn

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